

We had a productive meeting November 29th! Thanks to SFPUC for hosting and coordinating the tour of the Living Machine and building and thanks to all who joined us. Below is a summary of the meeting discussion and action items for your review and records:

1. BAAQMD Rule Updates

- a. [Regulation 11, Rule 18](#) (Rule 11-18): Risk Reduction from Air Toxic Emissions at Existing Facilities was adopted by the BAAQMD Board November 15. Attached is the list of “Potentially Subject Sites” that was distributed as part of the BAAQMD Board packet - we discussed the fact that BAAQMD staff does not project many POTWs to be subject to the Rule. For reference, a list of toxic air contaminants can be found in Table 2-5-1 [here](#). Late additions to the adopted regulation include establishing a Technical Dispute Resolution Committee (outside the variance process to address technical issues regarding the HRAs and Risk Reduction Plans) as well as a multi-stakeholder Rule 11-18 implementation workgroup (these are noted in the attached BAAQMD slides from the November 15 Board Meeting, Page 4). Randy Schmidt also presented Central San’s approach and experiences with preparing a recent Health Risk Assessment for the treatment plant (a copy of the presentation is attached).

Next Steps / Action Items:

- i. We will continue to coordinate with BAAQMD staff to update Proximity Adjustment Factors (PAF) for POTWs over the next couple months.
 - ii. With regard to updating influent flow and concentration data, Tim noted that there is an influent characterization study going forward, so POTWs will not be sampling as often (perhaps only once per five years as opposed to as often as monthly or twice annually).
 - iii. Summarize clear examples of projects already planned that may serve as a/the risk reduction measure to discuss how to handle them through the Rule 11-18 implementation.
- b. [Rule 9-2](#): Inorganic Gaseous Pollutants - Hydrogen Sulfide (H₂S) continues to impact some Authority-To-Construct permits for new projects, particularly digester and headworks/primary treatment projects. Several agencies shared the H₂S limits (in ppm) in their current permits and we are seeing how varied they are from one agency to another. It was noted that it is challenging to design appropriate technologies to anticipate permit condition limits that are unknown and unpredictable.

Next Steps / Action Items:

- i. EBMUD offered to share the engineering evaluation they performed for their permit conditions.
- c. The City of Petaluma shared their recent experience with a variance from permit conditions during construction of a second anaerobic digester. The discussion noted a need for developing appropriate permit conditions to address activities during construction and maintenance. This topic should be considered for inclusion in future discussions between BACWA and BAAQMD. The BAAQMD Permit Handbook includes language to address these situations, at least partially for maintenance activities, but (to date) the language has not been consistently included in permit conditions.

Next Steps / Action Items:

- i. We had previously discussed drafting Best Management Practices that would inform BAAQMD. Brenda Cabral agreed it would be helpful for BACWA to provide

the first draft. We discussed revisiting this and making sure we address the [Permit Handbook](#) (written by BAAQMD) for language on digester gas exemptions, landfill gas venting allowances per year, and an approach for when the methane content of digester gas is too low to justify combustion in engines. These will be reviewed and discussed during our next meeting.

2. Greenhouse Gas Items

- a. The draft [2030 Target Scoping Plan](#) was released October 27 (and the [final 2030 Target Scoping Plan](#) was released November 30). Included in the objectives are providing air quality co-benefits (such as criteria pollutants and toxic air contaminants, in support of AB 617) and supporting cost-effective and flexible compliance. The Plan supports the development of partnerships between waste management and wastewater facilities to manage organic waste (in support of SB 1383 mandates, see next item) and lists other potential additional/supporting actions for water and wastewater facilities that we will monitor over time. The final Plan is expected to be adopted December 14/15 - no further review or action is needed.
- a. [SB 1383 Short Lived Climate Pollutant \(SLCP\) Reduction Strategy Implementation](#) was discussed. CASA provided [comment](#) on the draft regulatory text with regard to land application of biosolids being a recycling option, disposal of sludge in a landfill as a temporary emergency measure, assurance of clean organic feedstocks, etc. The Rule is scheduled for adoption by the end of 2018. The legislation also encourages CEC and CPUC to incentivize the production and use of biogas. CASA has been discussing the barriers to pipeline injection with CPUC staff and they are about to open proceedings for determining a reasonable range of HHV (high heating value) for digester gas and updating their current standard of 990 Btu/scf.

Next Steps / Action Items:

- i. Continue to monitor the development of the regulation and coordinate with CASA's efforts in responding to CalRecycle.
- b. Sarah is participating in the BAAQMD Methane Expert Panel as the wastewater sector representative. The current focus of BAAQMD staff is drafting the General Methane Leak Prohibition rule and a new rule for composting operations with respect to methane and VOCs. A draft composting rule is anticipated by April 2018. At the end of last meeting (in November) she presented information to the panel about anaerobic digestion at wastewater treatment facilities and highlight work that has already been done by the Air Resources Board that shows there is no discernible methane emissions at wastewater facilities. They want to continue discussing the impact of SB 1383 on facilities in a future meeting.

Next Steps / Action Items:

- ii. Continue to participate on the Panel (next meeting is December 11) and develop a presentation on how SB 1383 will impact wastewater treatment facilities to distribute to BACWA members and get feedback.

The next meeting (and tour) is scheduled for March 21, 2018 and will be hosted by San Jose-Santa Clara Regional Wastewater Facility - Thanks to Ken Davies and Jason Nettleton!

Feel free to contact either of us if you have any questions or items you want to share with the Committee. We will be in touch regularly with updates between meetings.